

EXHIBIT 6

Thursday, May 30, 2024 at 08:10:29 Eastern Daylight Time

Subject: RE: Doe v. Rees - Deficiency Letters
Date: Tuesday, May 21, 2024 at 8:22:21 PM Eastern Daylight Time
From: Kirstie A. Means
To: Allison Mahoney
CC: Dennis C. Vacco, Scott S. Allen, Jr., Lindsay Lieberman
Attachments: image002.png, image469916.png

Lindsay and Allison:

Since we spoke last Thursday, I've been tied up with a large filing due the following day and preparing for and conducting a deposition that went forward today. Notwithstanding, Mr. Rees has confirmed corrections to his prior discovery responses are required, and we have attempted to resolve outstanding issues relative to ESI. Simultaneously, and as I disclosed last Thursday, we continue to work through the issue of moving forward with the need to withdraw our representation, which limits, in certain respects, our ability to address these issues. We intend to address the issue of moving forward with withdrawing our representation this week, but there is understandably limited information we can reveal in that respect. Still, and particularly since there are open discovery matters that are and will be implicated by this reality, please let me know if you're available for a call tomorrow (after 2pm ET) or Thursday (after 12pm ET) to discuss further as we prepare to raise this with the Court.

Thanks,
Kirstie

Kirstie A. Means
Partner



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From: Allison Mahoney <allison@almlawllc.com>
Sent: Tuesday, May 21, 2024 2:53 PM
To: Kirstie A. Means <kmeans@lippes.com>
Cc: Dennis C. Vacco <dvacco@lippes.com>; Scott S. Allen, Jr. <sallen@lippes.com>; Lindsay Lieberman <lindsay@lindsaylieberman.com>
Subject: Re: Doe v. Rees - Deficiency Letters

Kirstie,

Can you please provide an update (1) on Mr. Rees's response to our deficiency letters and (2) as to whether he will be supplementing his responses to our discovery requests. Also, do we have an agreement on the ESI protocol? If these issues aren't resolved, we are going to seek court intervention this week.

Thank you,
Allison

From: Lindsay Lieberman <lindsay@lindsaylieberman.com>

Date: Thursday, May 16, 2024 at 11:16 AM

To: Allison Mahoney <allison@almlawllc.com>

Cc: Kirstie A. Means <kmeans@lippes.com>, Dennis C. Vacco <dvacco@lippes.com>, Scott S. Allen, Jr. <sallen@lippes.com>

Subject: Re: Doe v. Rees - Deficiency Letters

Hi Kirstie,

Can you please let us know about when we can expect to hear from you about your motion to withdraw?

Thank you,

On Thu, May 16, 2024 at 8:47 AM Allison Mahoney <allison@almlawllc.com> wrote:

Sorry, I forgot to attach the document. Here it is.

Thanks again,
Allison

From: Allison Mahoney <allison@almlawllc.com>

Date: Thursday, May 16, 2024 at 8:46 AM

To: Kirstie A. Means <kmeans@lippes.com>

Cc: Dennis C. Vacco <dvacco@lippes.com>, Scott S. Allen, Jr. <sallen@lippes.com>, Lindsay Lieberman <lindsay@lindsaylieberman.com>

Subject: Re: Doe v. Rees - Deficiency Letters

Thanks, Kirstie. We have no objection to your edits to the ESI protocol. Attached is a revised draft. Please let us know if we have your permission to add your signature to the document.

Also, we would like to keep our 10:00 am call today. We understand that you may be limited in what you can discuss.

Best,
Allison

From: Kirstie A. Means <kmeans@lippes.com>
Date: Wednesday, May 15, 2024 at 5:11 PM
To: Allison Mahoney <allison@almlawllc.com>
Cc: Dennis C. Vacco <dvacco@lippes.com>, Scott S. Allen, Jr. <sallen@lippes.com>, Lindsay Lieberman <lindsay@lindsaylieberman.com>
Subject: RE: Doe v. Rees - Deficiency Letters

Good afternoon:

As indicated by my out of office and my email on May 8th, I was out of the office at the time these letters came in and just returned yesterday. I have had preliminary discussions with our client concerning the same, and he remains in the process of reviewing these letters in detail at this time. I will not be in a position to discuss them substantively by tomorrow morning. If you'd still like to hold the call tomorrow, let me know, but it would seemingly make more sense to briefly push it out; I have general availability next Wednesday and will be in a position to at least narrow the issues by that time via a supplemental production. In the meantime, I have minor edits to the proposed ESI protocol, which I've attached in redline.

Thanks,
Kirstie

Kirstie A. Means
Partner



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From: Allison Mahoney <allison@almlawllc.com>
Sent: Friday, May 10, 2024 8:59 AM
To: Kirstie A. Means <kmeans@lippes.com>
Cc: Dennis C. Vacco <dvacco@lippes.com>; Scott S. Allen, Jr. <sallen@lippes.com>; Lindsay Lieberman <lindsay@lindsaylieberman.com>
Subject: Doe v. Rees - Deficiency Letters

Counsel,

Attached please find two letters addressing deficiencies in Defendant's responses to Plaintiff's First Request for Production of Documents as well as Plaintiff's Amended First Request for Interrogatories. We look forward to discussing these issues with you in more detail next week.

Thanks,
Allison

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